

November 17, 2004

Mr. Dennis L. Koehl  
Site Vice President  
Nuclear Management Company, LLC  
6610 Nuclear Road  
Two Rivers, WI 54241

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2, LICENSE RENEWAL  
APPLICATION

Dear Mr. Koehl:

By letter dated February 25, 2004, Nuclear Management Company, LLC, (NMC or the applicant) submitted an application pursuant to 10 CFR Part 54, to renew the operating licenses for Point Beach Nuclear Plant (PBNP), Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC). The NRC staff is reviewing the information contained in the license renewal application (LRA) and has identified, in the enclosure, areas where additional information is needed to complete the review.

These RAs were discussed with your staff, Mr. Jim Knorr, and a mutually agreeable date for this response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-2232 or e-mail [MJM2@nrc.gov](mailto:MJM2@nrc.gov).

Sincerely,  
**/RA/**

Michael J. Morgan, Project Manager  
License Renewal Section A  
License Renewal and Environmental Impacts Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Docket Nos.: 50-266 and 50-301

Enclosure: As stated

cc w/encls: See next page

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OFFICIAL RECORD COPY

Point Beach Nuclear Plant, Units 1 and 2

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DISTRIBUTION: Ltr to D. Koehl, RAI for the Review of the Pt. Beach Nuclear Plant, Units 1 & 2, License Renewal Application, Dated: November 17, 2004

Adams accession no.: **ML043270653**

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Project Manager

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POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2  
LICENSE RENEWAL APPLICATION (LRA)  
REQUEST FOR ADDITIONAL INFORMATION (RAI)

**2.3.1.1 Class 1 Piping/Components System**

**RAI 2.3.1.1-1**

In the LRA Tables 2.3.1-1, 2.3.1-6 and 2.3.3-1, heat exchangers have been identified as component type within the scope of license renewal. However, specifically for these heat exchangers, the pressure boundary was identified as the only intended function requiring aging management, but not their heat transfer function. The staff requests the applicant to clarify why the heat transfer function need not be identified as within scope requiring aging management.

**2.3.1.2 Reactor Vessel**

**RAI 2.3.1.2-1**

Staff position on reactor vessel flange leak-off lines is that unless a plant specific justification is provided, the components should be in scope requiring aging management. Please confirm whether any of the component type listed in Table 2.3.1-2 (Reactor Vessel) or Table 2.3.1-6 (Non-Class 1 RCS Components System) of the LRA include the subject components. If not, then the subject components should be identified as within scope requiring aging management, or provide a plant specific justification.

**2.3.1.4 Pressurizer (PZR)**

**RAI 2.3.1.4-1**

LRA Drawings 541F091 Sh.2 and 541F445 Sh.2 show that the pressurizer relief tank (PRT) is in scope; whereas its sub-components, such as the PRT spray, the rupture disk, and the associated pipings are shown to be outside the scope. The staff believes that failure of PRT spray, rupture disk, and/or the associated pipings can result in failure of the PRT itself to perform its intended function. The staff, therefore, requests the applicant to include the PRT spray, rupture disk, and the associated pipings within the scope of license renewal, or to provide an explanation as to how failure of the PRT sub-components will not degrade the intended functions of the PRT.

**RAI 2.3.1.4-2**

In Table 2.3.1-4 (Pressurizer) of the LRA, PZR spray head was not listed as a component type subject to an AMR. But the LRA drawings 541F091 Sh.1 and 541F445 Sh.1 show that the PZR spray head are in scope. Please clarify. The staff believes that loss of the spray head due to aging will result in the failure of the pressure control function of the PZR which may be relied upon during and following design-basis events (DBE) and/or regulated events. If the

Enclosure

spray head was excluded from the scope, then the following additional information is requested:

a) The staff requests the applicant to justify how the components (spray head and associated pipings inside pressurizer) which are relied upon for pressure control function during plant transients, as stated in the LRA (page 2-79), do not require any aging management during the extended period of operation?

b) The staff requests the applicant to clarify if the current licensing basis (CLB) for fire protection(FP) complies with certain sections of Appendix R, particularly Section III.G, which provides the requirements for the fire protection safe shutdown capability. Discuss if the pressurizer spray head and associated piping are credited and relied upon in the fire protection safe shutdown analysis to bring the plant to cold shutdown conditions within a given time for compliance with Appendix R. If it is credited in the fire protection safe shutdown analysis, the pressurizer spray head and associated piping would satisfy 10 CFR 50.48, Appendix R requirements; and therefore, should be included within the scope of license renewal. The specific intended function of the subject components which meets the 10 CFR 54.4(a)(3) requirements is the spray function, and the particular components which help perform this function are the section of piping and the spray head located inside the pressurizer. Note that the subject components do not have pressure boundary function. The staff requests the applicant to describe whether the loss of spray function can make it impossible to bring the plant to cold shutdown conditions within the given time for compliance with Appendix R. If so, then the staff requests that the spray head and the associated piping inside pressurizer having the spray function be included within the scope requiring aging management so that it should provide a reasonable assurance that an adequate spray function will be maintained inside the pressurizer during the extended period of operation.